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 7 *ActionCOACH OneCo, LLC*  
 8 *and ActionCOACH North America, LLC*

9

10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 ACTIONCOACH NORTH AMERICA,  
 13 LLC, a Nevada limited liability company and  
 13 ACTIONCOACH ONECO, LLC, a Delaware  
 13 limited liability company,

14 Plaintiffs,  
 15 vs.

16 ALLISON DUNN, an individual; and DOE  
 16 INDIVIDUALS I-X and ROE  
 17 CORPORATIONS I-X,

18 Defendants.

Case No. 2:19-cv-02244-APG-DJA

19

20 **STIPULATION AND ORDER**  
 21 **TO EXTEND CASE MANAGEMENT**  
 22 **DEADLINES**

23 (First Request)

24 Pursuant to District of Nevada Local Rule 26-3, Plaintiffs ActionCOACH North America,  
 25 LLC and ActionCOACH OneCo, LLC (together “ActionCOACH” or “Plaintiffs”) and Defendant  
 26 Allison Dunn (“Defendant” or “Dunn”), hereby agree and stipulate to extend the remaining case  
 27 management deadlines by 90 days, as follows:

28 1. A Statement Specifying the Discovery Completed. The parties have each made  
 29 their initial disclosures. On May 15, 2020, Plaintiff’s counsel convened a telephonic Rule 26(f)  
 30 conference. ActionCOACH served its initial Rule 26(a)(1)(A) disclosures on June 15, 2020.  
 31 Dunn served her initial Rule 26(a)(1)(A) disclosures on July 8, 2020. In addition, the parties  
 32 have each served one set of written discovery. On September 24, 2020, ActionCOACH served  
 33 its first set of interrogatories and its first set of document requests upon Dunn. Dunn requested

1 and ActionCOACH granted Dunn a 10-day extension of time to serve written objections and  
2 responses. Dunn served her written objections and responses on November 2, 2020. Dunn is  
3 presently working on compiling responsive documents to produce in response to  
4 ActionCOACH's document requests. Dunn served ActionCOACH with her first interrogatories  
5 and her first document requests on November 10, 2020. ActionCOACH's written responses are  
6 presently due on December 10, 2020. No party has served any subpoenas and no party has  
7 noticed any depositions.

8       2.     A Specific Description of the Discovery that Remains to be Completed.  
9 ActionCOACH intends to follow-up on certain of Dunn's interrogatory answers and responses  
10 to document requests through a meet-and-confer with Dunn's counsel. ActionCOACH must  
11 also review Dunn's document production. ActionCOACH also intends to subpoena certain third  
12 parties for whom Dunn provided business coaching services. ActionCOACH also intends to  
13 take Dunn's deposition after it has reviewed her document production and after it has received  
14 and reviewed subpoenaed documents. Dunn intends to obtain written responses and discovery  
15 documents from ActionCOACH and take ActionCOACH's deposition.

16       3.     The Reasons why the Deadline was not Satisfied. The parties have been slow to  
17 conduct discovery in light of the current COVID-19 pandemic and associated restrictions on  
18 travel and in-person meetings that have limited their ability to take effective, in-person,  
19 depositions. It has been the parties' respective hope that such restrictions would be eliminated  
20 by now, allowing for "normal" discovery methods to proceed. However, to date, that has not  
21 occurred. In addition, ActionCOACH needs to review Dunn's document production and  
22 documents it intends to obtain by subpoena before it can take her deposition. Further, Dunn  
23 cannot yet take ActionCOACH's deposition because the time for ActionCOACH to respond to  
24 Dunn's discovery requests has yet to run. In light of the foregoing, the parties agree that good  
25 cause exists to extend the remaining case management deadlines.

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1        4.        A Proposed Schedule for Completing all Remaining Discovery.

2        The parties proposed the following extension of the case management deadlines:

3 <b>Current Remaining Deadlines</b>	4 <b>Proposed New Deadline</b>
4        Discovery Cutoff – 12/11/2020	3/11/2021
5        Dispositive Motions – 1/11/2021	4/11/2021
6        Joint Pretrial Order – 2/10/2021	5/10/2021

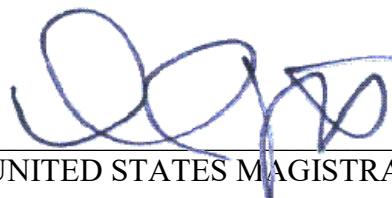
7        Dated this 20th day of November, 2020

8        **IT IS SO AGREED AND STIPULATED:**9        HOWARD & HOWARD  
10      ATTORNEYS PLLC

LINCOLN, GUSTAFSON &amp; CERCOS

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17      *ActionCOACH OneCo, LLC*  
18      *and ActionCOACH North America, LLC*By: /s/ Jeffrey M. Goldstein  
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Email: [jgoldstein@goldlawgroup.com](mailto:jgoldstein@goldlawgroup.com)19      *Attorneys for Defendant Allison Dunn*20      **IT IS SO ORDERED:**


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22  
23      UNITED STATES MAGISTRATE JUDGE  
24  
25

26      DATED: November 23, 202027  
28      4832-3983-2274, v. 2